



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

APR 22 2016

Jonathan W. Broyhill, 1372378  
Lanesboro Correctional Institution  
P.O. Box 280  
Polkton, NC 28135

RE: MUR 6738

Dear Broyhill:

On June 6, 2013 you were notified that the Federal Election Commission found reason to believe that you knowing and willfully violated 52 U.S.C. § 30114(b). After considering the circumstances of the matter, the Commission determined on March 15, 2016, to take no further action as to you, and closed the file in this matter. The Report Recommending to Close the File, which further explains the basis for the Commission's decision, is enclosed.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009).

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Daniel A. Petalas  
Acting General Counsel

A handwritten signature in black ink, appearing to read "Jeff S. Jordan", is written over the typed name.

BY: Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination and  
Legal Administration

Enclosure

GC Report, Recommendation to Close the File

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FEDERAL ELECTION COMMISSION  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2016 JAN -8 AM 11:38

**SENSITIVE**

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**MEMORANDUM**

**TO:** The Commission

**FROM:** Daniel A. Petalas  
Acting General Counsel

Kathleen Guith  
Acting Associate General Counsel for Enforcement

**BY:** William A. Powers *WAP*  
Assistant General Counsel for Enforcement

Emily M. Meyers *EMM*  
Attorney

**SUBJECT:** MUR 6738 (Jonathan Broyhill)  
Recommendation to Close the File

2016 JAN -8 AM 11:45

This matter was generated by a Complaint filed by Brad Miller for United States Congress (the "Committee"), Miller's principal campaign committee for the 2012 election in North Carolina's 13<sup>th</sup> Congressional District. The Complaint alleged that Jonathan W. Broyhill made a total of approximately \$58,000 of unauthorized disbursements from February 2011 through March 2013 while serving as the Committee's bookkeeper.<sup>1</sup> Broyhill concealed his embezzlement by entering false payments and disbursements in the Committee's records. Broyhill was the sole employee of SkyBlue Strategies, a proprietorship owned and operated by Jamie Hahn, which the Committee engaged for campaign management, fundraising, and compliance services. As the Committee's bookkeeper, Broyhill had access to the Committee's mailbox, telephone, e-mail account, bank account, checkbook, and reporting software.

On April 22, 2013, a few days after the Committee and Hahn discovered Broyhill's embezzlement, Hahn confronted Broyhill about his activities and Broyhill physically attacked Hahn and her husband, resulting in Hahn's death and seriously injuring her husband. On March

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On May 19, 2015, the Commission found reason to believe that Broyhill knowingly and willfully violated section 30114(b) of the Federal Election Campaign Act (the "Act"), and authorized conciliation prior to a finding of probable cause.

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## RECOMMENDATIONS:

1. Close the file.
2. Approve the appropriate letters.